

From: leadparalegal@lawofficeofchristyscott.com
Subject: RE: 19-125 ; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indiv; A. Swinehammer, indiv; L. Gibson, indiv; and as agents/officers Town of Bluffton PD & Town of Bluff PD :: C/A No.: 9:19-cv-2163-RMG-MGB
Date: September 8, 2020 at 1:43 PM
To: AN Bax office.baxlaw@gmail.com
Cc: Bax Law Firm arie.baxlaw@gmail.com, Naki Richardson-Bax naki.baxlaw@gmail.com, Christy Scott cscott@lawofficeofchristyscott.com

Great day, Elizabeth:

Thank you for speaking with me with regards to the above referenced matter.

Please allow this to confirm receipt of the Preliminary Report of Seth Stoughton along with the service package initially forwarded to our office in April 2020. As discussed, I was unaware that this had occurred. In any event, I apologize for any frustration and inconvenience that this may have caused.

Destiny is no longer employed by the firm. To date, I have not had an opportunity to review what was left behind; however, I can assure you that this will not happen in the future.

Tamika D. Simmons
Lead Paralegal to Christy L. Scott

May everyday be filled with great expectation and overwhelming peace!

Law Offices of Christy L. Scott, LLC
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From: AN Bax <office.baxlaw@gmail.com>
Sent: Tuesday, September 8, 2020 12:44 PM
To: cscott@lawofficeofchristyscott.com; leadparalegal@lawofficeofchristyscott.com
<leadparalegal@lawofficeofchristyscott.com>; tstephens@lawofficeofchristyscott.com;
Destiny Rose <paralegal3@lawofficeofchristyscott.com>
Cc: Bax Law Firm <arie.baxlaw@gmail.com>; Naki Richardson-Bax
<naki.baxlaw@gmail.com>
Subject: Re: 19-125 ; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indiv; A. Swinehammer, indiv; L. Gibson, indiv; and as agents/officers Town of Bluffton PD & Town of Bluff PD :: C/A No.: 9:19-cv-2163-RMG-MGB

 [Preliminary Expert Report, 4-1-2020.pdf](#)

Good afternoon,

Attached is the Preliminary Report that was sent to you on April 27th via email and hard copies were sent via USmail to Christy Scott's Office PO Box on April 28, 2020. Also attached is the pdf version of the cover letters and the copy of the envelope with date written upon it and the picture of the envelope

that was taken at the time it was put in the mail.

This is the second time your office has 'lost' discovery and quite frankly it is really frustrating that I have to stop what I am currently working on to locate the proof of where I sent the discovery to you and resend it. If you were expecting a certain type of discovery and for some reason you weren't able to open it or have access to it, why wouldn't anyone in your office say anything about it then? Not to mention, when I spoke to Destiny on August 21st, she said one of your new paralegals lost our discovery request that was sent to you on April 8th.

I get it, things happen, but four months have gone by since it was sent to you and not a word of anything missing. It's ridiculous that this much time has passed, our attorneys have spoken to each other, and none of this was mentioned until now.



Sincerely,

Elizabeth Bufkin
Paralegal
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*****Due to the current state of emergency, Bax Law Firm is operating remotely only. We are still available via telephone (843) 522-0980 and email. We are scheduling meetings via Telephone and Zoom or Facetime video conference. Although we are receiving mail, kindly email any documents requiring an immediate or timely response.*** Our physical location will be closed until further notice.**

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